## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEBRASKA

NADIA BIGLARI,	) Case No. 4:22-CV-3268
Plaintiff,	) )
,	DEFENDANT ERIC DODDS'
v.	UNOPPOSED MOTION FOR
•	EXTENSION OF TIME TO FILE
UNIVERSITY OF NEBRASKA LINCOLN, by	RESPONSIVE PLEADING
and through its Board of Regents; ERIC	
DODDS; in his official capacity and	
individual capacity,	
Defendants.	

COMES NOW Defendant Eric Dodds in his official capacity and individual capacity, and pursuant to Federal Rule of Civil Procedure 6(b)(1)A), moves the Court for an Order extending Defendant's time to respond to Plaintiff's Complaint in this action to April 21, 2023. In support hereof, Defendant states the following:

- 1. The Defendant received the Summons and Complaint on or about March 2, 2023.
- 2. Pursuant to FED. R. CIV. P. 12(a)(1)(A)(i), the current deadline for Defendant to respond to Plaintiff's Complaint is March 23, 2023.
- 3. Good cause exists for the extension requested herein, as Defendant requires additional time to investigate the facts of this case and prepare a response to Plaintiff's Complaint.
- 4. Defendant has not previously requested an extension of time to respond to Plaintiff's Complaint.
- 5. Plaintiff's counsel has indicated to the undersigned that he does not oppose this motion and agrees to an extension as requested herein.

WHEREFORE Defendant requests the Court enter an Order granting an extension of Defendant's time to respond to Plaintiff's Complaint, such that the deadline for Defendant to respond to Plaintiff's Complaint shall be April 21, 2023.

DATED this 22nd day of March, 2023.

ERIC DODDS, in his official capacity and individual capacity, Defendant

By: /s/ Lily Amare

> Susan K. Sapp #19121 Lily Amare #25735 Cline Williams Wright Johnson & Oldfather, L.L.P. 1900 U.S. Bank Building 233 South13th Street Lincoln, NE 68508 (402) 474-6900 ssapp@clinewilliams.com lamare@clinewilliams.com

AND

Bren H. Chambers, #23150 Deputy General Counsel University of Nebraska 3835 Holdrege Street Lincoln, NE 68583-0745 402-472-1201 bchambers@nebraska.edu

## **CERTIFICATE OF SERVICE**

I hereby certify that on March 22, 2023, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all parties who have entered an appearance in this case as well as electronically transmitted.

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/s/ Lily Amare Lily Amare

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